

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> , Debtors.	CHAPTER 11 Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., Plaintiff, v. 1 ST ADVANTAGE MORTGAGE, L.L.C., et al., Defendant.	Adv. Pro. No. 16-01019 (SCC)
LEHMAN BROTHERS HOLDINGS INC., Plaintiff, v. BONDCORP REALTY SERVICES INC., Defendant.	Adv. Pro. No. 16-01302 (SCC)

**DECLARATION OF ARTHUR J. PRIESTON IN SUPPORT OF MOTION OF
AMERICAN MORTGAGE LAW GROUP, P.C. TO WITHDRAW AS ATTORNEYS OF
RECORD FOR DEFENDANT BONDCORP REALTY SERVICES INC.**

I, ARTHUR J. PRIESTON, declare as follows:

1. I am an attorney at law, duly licensed to practice before all the courts in the state of California.
2. I have personal knowledge of the facts sets forth in this Declaration, and I could and would competently testify to those facts under oath if called to do so.
3. I am the principal of the law firm of American Mortgage Law Group, P.C. (“AMLG”), which is counsel of record for Defendant Bondcorp Realty Services Inc. (“Bondcorp”) in this action.
4. There are no disciplinary proceedings pending against me.
5. I submit this declaration in support of AMLG’s motion to withdraw as

Bondcorp's counsel of record in this action.

6. Pursuant to its written legal services agreement with Bondcorp, AMLG has provided agreed upon legal services to Bondcorp in this action.

7. Despite its written contractual agreement to timely pay AMLG's invoices for legal fees and expenses, Bondcorp has not paid any legal any fees to AMLG on account of its invoices since March 2017.

8. AMLG has been trying to obtain payment on its account from Bondcorp since January 2018.

9. Over the past several months, I and attorneys at AMLG have been in contact with Bondcorp to attempt to arrange for Bondcorp to bring its account with AMLG current, but Bondcorp has not agreed to do so and has not made any payment on its account.

10. Bondcorp's failure to timely pay its legal fees and expenses seriously impairs AMLG's ability to represent Bondcorp in this action.

11. Bondcorp has indicated that it does not intend to pay the legal fees and expenses it owes to AMLG.

12. Bondcorp also has indicated that it consents to AMLG's withdrawal as its counsel of record in this action.

13. AMLG's withdrawal as Bondcorp's counsel of record in this action will not prejudice Bondcorp nor substantially impede the progress of this action. The Court has currently not entered an Amended Case Management Order in this action and there is a case status conference scheduled for March 7, 2019 in this action. Nor has the Court set a deadline for Bondcorp to file an answer to the complaint in this action.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed at Lake Tahoe, California on February 13, 2019.

/s/ Arthur J. Prieston

Arthur J. Prieston